

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

COMMONWEALTH OF
PENNSYLVANIA, By Michelle A. Henry,
Attorney General,

Plaintiff,

vs.

PROSPECT MEDICAL HOLDINGS,
INC., PROSPECT CROZER, LLC,
LEONARD GREEN AND PARTNERS,
SAMUEL LEE, Individually, and DAVID
TOPPER, Individually,

Defendants.

CIVIL ACTION

Case No. 2:24-cv-05853-JP

DEFENDANTS SAMUEL LEE AND DAVID TOPPER'S
AMENDED NOTICE OF CONSENT TO REMOVAL

Defendants Samuel Lee and David Topper hereby consent to the removal of this action from Delaware County Court of Common Pleas, Case No. 2024-009428, to the United States District Court for the Eastern District of Pennsylvania pursuant to 28 U.S.C. §§ 1332, 1441, and 1446, and as articulated in Defendants Prospect Medical Holdings, Inc. and Prosect Crozer, LLC's Amended Notice of Removal filed on November 27, 2024. Defendants Samuel Lee and David Topper reserve all rights and defenses in this action.

Respectfully submitted,

DATED: December 4, 2024

Bird, Marella, Rhow,
Lincenberg, Drooks & Nessim, LLP

By: /s/ Devon E. Porter
Ekwan E. Rhow, Esquire (*Pro Hac Vice*
Application Pending)
Devon E. Porter, Esquire (PA Bar #327898)
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Attorneys for Defendants Samuel Lee and
David Topper

CERTIFICATE OF SERVICE

I, Devon E. Porter, Esquire hereby certify that on this 4th day of December, 2024, a true and correct copy of the foregoing Defendants Samuel Lee and David Topper's Amended Notice of Consent to Removal was served via ECF upon all counsel of record

/s/ Devon E. Porter, Esq.

Devon E. Porter, Esq.